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REMARKS

The present application has pending claims 1-19. No amendments were made to the claims.

The Examiner is strongly urged to contact Applicants' Attorney, the undersigned, by telephone so as to discuss the outstanding issues of the present application prior to examination. Although the Examiner gave a passing response to Applicant's arguments, the Examiner still has not shown in any detail or with the required specificity how each and every limitation recited in the claims is obvious when compared to the references of record. Therefore, an interview is needed to fully discuss these issues prior to any further examination.

Claims 1-19 stand rejected under 35 USC §103(a) as being unpatentable over Martin (U.S. Patent No. 5,504,873) in view of Akizawa (U.S. Patent No. 5,548,724) and further in view of Abe (U.S. Patent No. 6,880,104). This rejection is traversed for the following reasons. Applicants submit that the features of the present invention as now more clearly recited in claims 1-19 are not taught or suggested by Martin, Akizawa or Abe whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw this rejection.

Amendments were made to independent claims 1 and 15, from which the remaining claims depend, so as to more clearly recite that the present invention provides a storage device system and a method of activating a storage device system, wherein the storage device system includes a plurality of storage devices in which information is stored, a storage device control

section for controlling storage of information in the storage devices, a connection unit connected to the storage device control section and first and second processors.

According to the present invention the first processor is connected to a local area network (LAN) external to the storage device system and converts data of a file access form received over the LAN into data of a block access form.

Further, according to the present invention the second processor is connected to the storage device control section via the connection unit and accesses the storage devices via the connection unit and the storage device control section in response to data of the block access form issued from the first processor.

Particularly, according to the present invention as now more clearly recited in the claims the second processor controls activation of the first processor including resetting the first processor by the second processor, re-supplying power to the first processor and activating a Basic Input/Output System (BIOS) of the first processor.

The above described features of the present invention now more clearly recited in the claims are illustrated, for example, in Fig. 17 and described in the corresponding portions of the specification.

The above described features of the present invention now more clearly recited in the claims are not taught or suggested by any of the references of record whether taken individually or in combination with each other. Particularly, the above described features of the present invention as now more clearly recited in the claims are not taught or suggested by Martin,

Akizawa or Abe whether taken individually or in combination with each other as suggested by the Examiner.

In the Office Action, it again appears that the Examiner incorrectly alleges that Martin discloses enabling the control system 40 to allocate storage resources and releases the allocations and noticing the control system 40 when the IFS, which is one of the resources, performs a read/write process. Attention is directed to col. 4, lines 48-59 of Martin. However, it is quite clear that Martin does not teach or suggest any of the above described features of the present invention now more clearly recited in the claims.

Particularly, at no point is there any teaching or suggestion in Martin that the second processor controls activation of the first processor including resetting the first processor by the second processor, re-supplying power to the first processor and activating a Basic Input/Output System (BIOS) of the first processor as recited in the claims.

Applicant again emphasizes that one basic factor the Examiner has failed to address is how the control processors 114 and 116 as taught by Martin are equivalent to the first and second processors as recited in the claims. The claims clearly recite that the first processor receives data of a file access form from the host computer and converts the data of the file access form to data of a block access form and the second processor receives the data of the block access form and transfers the data to the disk drive. Those of ordinary skill in the art clearly understand that a file access or file access type data is quite different from a block access or block access type data. Thus, the first processor performs functions in the handling of data differently than the second processor according to the present invention.

There is no similar teaching in Martin. In Martin, the control processors 114 and 116 merely perform the control of allocations of resources as described in col. 4, lines 48-59. There is absolutely no teaching or suggestion in Martin that one of the control processors 114 performs processing according to file access type data and that the other of the control processors perform functions according to block access type data as in the present invention.

Thus, Martin fails to teach or suggest a first processor that converts data of a file access form received over the LAN into data of a block access form and a second processor that accesses the storage devices in response to data of the block access form issued from the first processor as recited in the claims.

The above described deficiencies of Martin are not supplied by Akizawa. Akizawa is merely relied upon by the Examiner for an alleged teaching of converting information of a first form received over the external network into information of a second form. However, at no point is there any teaching or suggestion in Akizawa of the above described features of the present invention now more clearly recited in the claims that are not taught or suggested by Martin.

The above described deficiencies of both Martin and Akizawa are not supplied by Abe. Abe merely discloses that a memory protection unit obtains control of a DIMM 31 from a chip set by way of switching switches 11 and 12 when detecting an unexpected power shutdown. Abe is completely silent as to the activation of a NAS processor as recited in the claims.

In the Office Action the Examiner attempts to equate the memory protection unit 10 of Abe to the second processor (i.e. I/O processor) as recited in the claims. However, the memory protection unit 10 of Abe is quite different from I/O processor of the present invention as recited in the claims. The I/O processor of the present invention as recited in the claims performs accessing of storage devices in response to data in block access form received from the NAS processor. Such features are clearly and absolutely not taught or suggested by Abe.

Thus, Martin, Akizawa and Abe all suffer from the same deficiencies relative to the features of the present invention as now more clearly recited in the claims. Therefore, combining Martin, Akizawa and Abe in the manner suggested by the Examiner in the Office Action would still be deficient of the features of the present invention as now more clearly recited in the claims. Accordingly, reconsideration and withdrawal of the 35 USC §103(a) rejections of claims 1-19 as being unpatentable over Martin in view of one or more of Akizawa and Abe is respectfully requested.


The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in the rejection of claims 1-19.

In view of the foregoing amendments and remarks, applicants submit that claims 1-19 are in condition for allowance. Accordingly, early allowance of claims 1-19 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C., Deposit Account No. 50-1417 (TMI-5010).

Respectfully submitted,

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